

La Vina Ranch

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March 26, 2008

Mr. Vincent J. Fusaro
Standardization Section
Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W., Room 1661
South Building, Stop 0240
Washington, D.C. 20250-0240

VIA fax transmission: (202) 720-8871

Re: United States Standards for Grades of Table Grapes
(European or Vinifera Type)
Docket #AMS-FV-07-0140

Dear Mr. Fusaro:

We want to express our support for AMS's proposal to add a 5 percent allowance for shattered grapes to the U.S. Standards for Grades of Table Grapes (European or Vinifera Type).

As a California table grape grower and shipper, we pack over 95% of our grapes into consumer-ready materials. Therefore, any shatter is sold through to the consumer and not lost in the bottom of the box before it gets to the retailer's shelf.

We aim for good-tasting fruit. Part of what is required for good flavor is plenty of sugar. In general, the more sugar you have, the more shatter you get. Restrictive shatter rules encourage growers to harvest early so they're less likely to have a shatter problem. So growers are incentivized to put grapes on the market that may not taste as good as they should. For this reason, we believe that a higher tolerance in the grade standards for shatter will allow growers to wait longer for better flavor, which will increase sales because consumers will get a better-eating grape.

The arguments against increasing the shatter tolerance seem to center on a few issues. One concern is that shattered grapes are more prone to decay and therefore defective. USDA standards are meant to evaluate actual defects, not potential defects. Any such change in standards would be a slippery slope endangering the whole produce industry.

People in opposition also claim that shattered grapes are defective, period, even if they're just as strong as the best grapes that are still attached. They say that if the grape became detached, it must have been weaker fruit to begin with. This is just not true. Anyone who's ever handled grapes knows that handling and transportation can cause perfectly healthy grapes to become detached from the stem. While we believe it is possible that you'll see more condition defects (wet, sticky and decay) in shattered grapes than in attached grapes, the same standards for these defects still apply: if those shattered grapes have condition defects, they'll be scored in the inspection. Nothing about the new standard changes this.

Another argument we've heard against raising the shatter tolerance is that shattered grapes are old (and apparently therefore of lesser quality). Grape shatter is not a function of age. It is a function of sugar content and inherent characteristics of that particular variety, as well as post-harvest handling. Grapes brixing 16 will shatter a whole lot less on the average than grapes brixing 21. Certain varieties tend to have more shatter than others. And yes, handling and shipping can increase shatter. But we have never known longer periods in the cooler to be a cause of shatter, and we've stored a lot of grapes over the years.

We have lost many tens of thousands of dollars over the years due to our grapes failing to make arrival under either US No 1 or Good Delivery standards due to shatter. We have always felt that this was unfair, and we applaud industry efforts to change the rules.

Thank you for your consideration.

Sincerely,



Karrie Besuner
President